

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

STEPHEN KERSHNAR,

Plaintiff,

23-cv-525

-vs-

STEPHEN H. KOLISON, JR., in his individual  
capacity and his official capacity as the President  
of the State University of New York at Fredonia, and

DAVID STARRETT, in his individual capacity and  
official capacity as Executive Vice President and  
Provost of the State University of New York at  
Fredonia,

Defendants.

---

**DEFENDANTS' EXHIBIT LIST**

LETITIA JAMES  
Attorney General of the State of New York  
JENNIFER METZGER KIMURA  
ALYSSA JORDAN PANTZER  
Assistant Attorneys General, of Counsel  
350 Main Street, Suite 300A  
Buffalo, NY 14202

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

**EXHIBIT LIST**

**Case No.:** 23-cv-525

**( ) Plaintiff**

**Date:** September 13, 2023

**(X) Defendants**

<b>Exhibit No.</b>	<b>Description</b>	<b>Marked for Identification</b>	<b>In Evidence</b>
1	Chief Brent Isaacson's Declaration plus attached exhibits A-F		
2	Interim Chief Charles Holder's Declaration plus attached exhibit A		
3	February 22, 2022, Case Report Detail involving Brian Boisvert		
4	February 7, 2022, Email from Chief Isaacson to Plaintiff regarding safety threats made to Plaintiff		
5	February 4, 2022, Email from Scott Martin to Soteris Tzitzis (copying Chief Isaacson) requesting that the panic button be repaired and that this was a high priority		
6	February 3, 2022, Email from Wayne Michael, waynemichael76@gmail.com, to President Office inbox conveying threat		
7	February 2, 2022, Email from Jennifer Kellner, apexkellner@icloud.com, to President Office inbox conveying threat		
8	February 3, 2022, Email from Alanna Shores, Alannashores@gmail.com, to President Office inbox conveying threat		
9	February 3, 2022, Email from Garrett "G" Adams, garrett.adams.sales@gmail.com, to Admissions Office inbox conveying threat		
10	February 2, 2022, Email from Rebecca Moran, rmoran511@hotmail.com, to Admissions Office inbox conveying threat		
11	February 2, 2022, Email from Bette Korn, bk1144@aol.com, to Admissions Office inbox conveying threat		

12	February 2, 2022, Email from Jeff Greco, jgrecoconstr@aol.com, to Admissions Office inbox conveying threat		
13	February 2, 2022, Email from TD, troyderengowski61@gmail.com, to Admissions Office inbox conveying threat		
14	February 2, 2022, Change.org petition where student says she does not feel safe		
15	Compilation of threatening emails pulled from Plaintiff's SUNY Fredonia email account, created by Plaintiff		
16	Compilation of social media and tweet responses collected by Chief Brent Isaacson		
17	February 3, 2022, Email from Mike Villano, michaelvillano@att.net, to Plaintiff conveying threat		
18	February 2, 2022, Email from scotter0123@gmail.com, to Plaintiff conveying threat		
19	February 2, 2022, Email from Chris Beauvais, csjb1@msn.com, to Plaintiff conveying threat		
20	February 2, 2022, Email from Cassandra Cotton, cotton.kassandra@ymail.com, to Plaintiff conveying threat		
21	February 2, 2022, Email from Mondrone King, mondroneking@gmail.com, to Plaintiff conveying threat		
22	February 2, 2022, Email from Leslie Garcia, leliegarcia93@outlook.com, to Plaintiff conveying threat		
23	February 4, 2022, Email from Hamish McGregor, mrhamish.mcgregor@gmail.com, to Plaintiff conveying threat		
24	February 4, 2022, Email from STOVE 5014, vzombiekilled@gmail.com, to Plaintiff conveying threat		
25	February 2, 2022, Email from John Waszewski, jwaszewski1960@gmail.com, to Plaintiff conveying threat		
26	On or about February 7, 2022, voicemail from (415) 261-8494, conveying threat stating "He's a Jew and a parasitic animal."		
27	On or about February 7, 2022, voicemail from (615) 649-1604, to Registrar's Office conveying threat stating "Punch the President in the fucking face" and "We're coming for you."		

28	On or about February 7, 2022, telephone call to the University Police Department's Commissioner's Office in Albany, conveying threat stating "I feel like driving there myself and killing him."		
29	On or about February 4, 2022, telephone call to the University Police Department in Fredonia from David Debrienza, conveying threat stating that he "will make his presence known."		
30	On or about February 2, 2022, telephone call to the Office of University Life in Albany from Randall Harnden, conveying threat stating "We need to stop institutions like you."		
31	February 2, 2022, telephone call to Fredonia's University Police Department, conveying threat stating "I've got thousands of followers on social media" and "We're not going to stop."		
32	February 2, 2022, voicemail left by a caller with number (860) 235-5154, conveying threat stating "You sons of bitches better fucking do something about it."		
33	September 20, 2022, Threat Assessment Report by A1C Partners, LLC		
34	April 8, 2022, Social Media Assessment by AMI Aware		
35	January 4, 2023, Memorandum by Chief Brent Isaacson documenting unsolicited telephone call from FBI Special Agent Chard Artip regarding threatening communications		

**DATED:** August 23, 2023  
Buffalo, New York

**LETITIA JAMES**  
Attorney General of the State of New York  
Attorneys for Defendants

BY: s/ Jennifer Metzger Kimura  
JENNIFER METZGER KIMURA  
ALYSSA PANTZER JORDAN  
Assistant Attorneys General of Counsel  
Main Place Tower  
350 Main Street, Suite 300A  
Buffalo, New York 14202  
(716) 853-8477  
Jennifer.Kimura@ag.ny.gov  
Alyssa.Pantzer@ag.ny.gov